

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA)	DOCKET NO.
)	
)	FACTUAL BASIS
v.)	
)	
)	
KYREE JAMAYL CORBETT)	
_____)	

NOW COMES the United States of America, by and through Dena J. King, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. On or about December 21, 2021, in the Western District of North Carolina, the defendant, KYREE JAMAYL CORBETT, aided and abetted by others known and unknown to the Grand Jury, did assault C.C., a person having lawful charge, custody, and control of United States mail matter, money, and other property of the United States, with intent to rob, steal and purloin said mail matter, money and other property of the United States, specifically, a United States Postal Service key.

2. CORBETT and his accomplices took and attempted to take a United States Postal Service key from the person of C.C., which key was the property of the United States then in the lawful charge, control, or custody of C.C., against C.C.'s will, by means of force and violence and

by means of intimidation.

3. At the time C.C. was robbed by CORBETT and his accomplices, C.C. was a United States Postal Service government employee and the armed robbery was motivated by such status.

4. Beginning no later than December 21, 2021, and continuing through on or about June 2, 2022, in the Western District of North Carolina, the defendant, KYREE JAMAYL CORBETT, did knowingly combine, conspire, confederate, and agree with persons known and unknown to the Grand Jury, to commit offenses against the United States, that is, to steal and possess stolen mail in violation of Title 18 United States Code, Section 1708.

5. The manner and means through which CORBETT and his co-conspirators carried out the conspiracy included, among others:

a. CORBETT and his co-conspirators drove to post offices and business parks in Charlotte, North Carolina, to check United States Postal collection boxes and other authorized depositories for outgoing and incoming mail.

b. CORBETT and his co-conspirators used a stolen United States Postal Service key to open the collection boxes and steal the tubs containing the outgoing mail from within the collection boxes.

c. CORBETT and his co-conspirators frequently drove to multiple post offices and business parks in quick succession to steal mail from collection boxes at each location.

d. CORBETT and his co-conspirators would open the stolen mail and would remove the contents of the stolen mail, including checks.

6. In furtherance of the conspiracy and to effect the object thereof, there was committed by at least one of the conspirators, in the Western District of North Carolina and elsewhere, at least one of the following overt acts:

a. On or about December 23, 2021, CORBETT stole mail from a United States Postal collection box located at the United States Post Office South Providence Station, 11035 Golf Links Drive, Charlotte, North Carolina ("the South Providence Station").

b. On or about December 23, 2021, CORBETT stole mail from a United States Postal collection box located at the United States Post Office Ballantyne Station, 8240 Ballantyne Commons Parkway, Charlotte, North Carolina ("the Ballantyne Station").

c. On or about March 16, 2022, CORBETT stole mail from a United States Postal collection box located at the Ballantyne Station.

d. On or about April 11, 2022, CORBETT stole mail from a United States Postal collection box located at the Ballantyne Station.

e. On or about April 18, 2022, CORBETT stole mail from a United States Postal collection box located at the Ballantyne Station.

f. On or about May 2, 2022, CORBETT stole mail from a United States Postal collection box located at the Ballantyne Station.

g. On or about May 9, 2022, CORBETT stole mail from a United States Postal collection box located at the South Providence Station.

h. On or about May 30, 2022, CORBETT stole mail from a United States Postal collection box located at the Ballantyne Station.


i. On or about June 2, 2022, CORBETT possessed stolen mail.

7. At all times, CORBETT acted intentionally, knowingly and willfully and not by accident or mistake.

8. On June 2, 2022, CORBETT and his co-conspirators possessed at least 1030 stolen checks totaling at least \$1,877,083.80 in aggregate value, such checks having been taken out of mail envelopes that had been left for collection in collection boxes or other authorized depositories of mail matter in the course of the conspiracy.

9. The mail theft conspiracy involved 10 or more victims.


DENA J. KING
UNITED STATES ATTORNEY



GRAHAM BILLINGS
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis and the Bill of Indictment in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis and the Bill of Indictment. I hereby certify that the defendant does not dispute this Factual Basis.


Chiege Okwara, Attorney for Defendant

DATED:

